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Attorneys for Plaintiff JENS ERIK SORENSEN,
as Trustee of SORENSEN RESEARCH AND
DEVELOPMENT TRUST

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

JENS ERIK SORENSEN, as Trustee of)	Case No. 08cv25 BTM CAB
SORENSEN RESEARCH AND)	
DEVELOPMENT TRUST,)	
)	FOURTH AMENDED NOTICE OF
Plaintiff)	RELATED CASES
v.)	
)	
JOHNSON LEVEL & TOOL MFG. CO.,)	
INC., a Wisconsin corporation; and)	
DOES 1 – 100,)	
)	
Defendants.)	
)	
)	

1 Pursuant to Local Civil Rule 40.1(e), Plaintiff JENS E. SORENSEN, as
2 TRUSTEE OF THE SORENSEN RESEARCH AND DEVELOPMENT TRUST
3 (“SRDT”), hereby gives FOURTH AMENDED notice of cases related to the present
4 case. Specifically, SRD TRUST gives notice of the following related cases that all
5 arise from alleged infringement of United States Patent Number 4,935,184 (“the ‘184
6 patent”), whether pending, dismissed, or otherwise terminated:

7 **JUDGMENT ENTERED**

8 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
9 *Trust v. First International Digital, Inc., et al*, Case No. 3:07-cv-5525-JSW, filed
10 October 30, 2007 in the United States District Court for the Northern District of
11 California. Judgment of \$500,000.00 has been entered.

12
13 **PENDING – NOT STAYED**

14 *Acco Brands USA LLC v. Jens Erik Sorensen as Trustee of the Sorensen*
15 *Research and Development Trust*, Case No. 08cv1670 JAH JMA, filed September
16 12, 2008 in the USDC for the District of Southern California.

17 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
18 *Trust v. Conair Corporation*, Case No. 08cv1256, filed July 11, 2008 in the United
19 States District Court for the District of Southern California. Plaintiff alleges
20 infringement of the ‘184 patent by Defendants. Assignment to the same district
21 judge as other ‘184 patent cases in the district has already occurred.

22 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
23 *Trust v. Phillips Plastics Corp.*, Case No. C08-03094, filed June 26, 2008 in the
24 United States District Court for the District of Northern California. Plaintiff alleges
25 infringement of the ‘184 patent by Defendants. A motion to transfer this case is
26 pending. A request to relate this case to others in the Northern District was denied.

27 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
28 *Trust v. Human Touch LLC, et al*, Case No. 08cv1080, filed June 18, 2008 in the

1 United States District Court for the District of Southern California. Plaintiff alleges
2 infringement of the '184 patent by Defendants. Assignment to the same district
3 judge as other '184 patent cases in the district has already occurred.

4 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
5 *Trust v. Lexar Media, Inc.*, Case No. 5:08-cv-00095-JW, filed January 7, 2008 in the
6 United States District Court for the District of Northern California. Plaintiff alleges
7 infringement of the '184 patent by Defendants. A requested stay has already been
8 denied and this case is proceeding towards trial.

9 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
10 *Trust v. Johnson Level & Tool Mfg. Co., Inc.*, Case No. 3:08-cv-0025-BTM-CAB,
11 filed January 4, 2008 in the United States District Court for the District of Southern
12 California. Plaintiff alleges infringement of the '184 patent by Defendants.
13 Assignment to the same district judge as other '184 patent cases in the district has
14 already occurred.

15 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
16 *Trust v. Ampro Tools Corporation*, Case No. 4:08-cv-00096-CW, filed January 7,
17 2008 in the United States District Court for the District of Northern California.
18 Plaintiff alleges infringement of the '184 patent by Defendants. A default judgment
19 motion is pending.

20 *PowerStation LLC, et al v. Sorensen Research and Development Trust*, Case
21 No. 07-cv-04167-RBH, filed December 31, 2007 in the United States District Court
22 for the District of South Carolina. Plaintiff seeks declaratory judgment that the '184
23 patent is invalid and not infringed by them, and also makes an unfair trade practices
24 claim. A Rule 12 motion for transfer for lack of personal jurisdiction is under
25 submission.

26 *Big Lots Stores, Inc. v. Sorensen Research and Development Trust*, Case. No.
27 08cv00506, filed May 23, 2008 in the United States District Court for the Southern
28 District of Ohio. Plaintiff seeks declaratory judgment that the '184 patent is invalid

1 and not infringed by them. No summons or complaint have been served, and this
2 case will be the subject of a Rule 12 motion for transfer for lack of personal
3 jurisdiction.

4 *Freshlink Product Development, L.L.C. v. Sorensen Research & Development*
5 *Trust*, Case. No. 08cv05021, filed May 30, 2008 in the USDC for the Southern
6 District of New York. No summons or complaint have been served, and this case
7 will be the subject of a Rule 12 motion for transfer for lack of personal jurisdiction.

8 *American Safety Razor Co. v. Sorensen Research & Development Trust*, Civil
9 Case No. 07-CV-00730-HHK, filed April 20, 2007, in the United States District
10 Court for the District of Columbia. No summons or complaint have been served, and
11 this case will be the subject of a Rule 12 motion for transfer for lack of personal
12 jurisdiction.

13 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
14 *Trust v. DMS Holdings, Inc., et al.*, Case No. 08cv559, filed March 25, 2008 in the
15 United States District Court for the District of Southern California. Plaintiff alleges
16 infringement of the '184 patent by Defendants. Assignment to the same district
17 judge as other '184 patent cases in the district has already occurred.

18 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
19 *Trust v. Alltrade Tools, LLC., et al.*, Case No. 08cv232, filed February 5, 2008 in the
20 United States District Court for the District of Southern California. Plaintiff alleges
21 infringement of the '184 patent by Defendants. Assignment to the same district
22 judge as other '184 patent cases in the district has already occurred.

23
24 **PENDING - STAYED**

25 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
26 *Trust v. Metabo Corporation, et al.*, Case No. 08cv304, filed February 15, 2008 in
27 the United States District Court for the District of Southern California. Plaintiff
28 alleges infringement of the '184 patent by Defendants. Assignment to the same

1 district judge as other '184 patent cases in the district has already occurred.

2 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
3 *Trust v. Star Asia, U.S.A., LLC, et al.*, Case No. 08cv307, filed February 15, 2008 in
4 the United States District Court for the District of Southern California. Plaintiff
5 alleges infringement of the '184 patent by Defendants. Assignment to the same
6 district judge as other '184 patent cases in the district has already occurred.

7 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
8 *Trust v. Kyocera International, Inc., et al.*, Case No. 08cv411, filed March 4, 2008 in
9 the United States District Court for the District of Southern California. Plaintiff
10 alleges infringement of the '184 patent by Defendants. Assignment to the same
11 district judge as other '184 patent cases in the district has already occurred.

12 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
13 *Trust v. Central Purchasing, LLC, et al.*, Case No. 08cv309, filed February 15, 2008
14 in the United States District Court for the District of Southern California. Plaintiff
15 alleges infringement of the '184 patent by Defendants. Assignment to the same
16 district judge as other '184 patent cases in the district has already occurred.

17 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
18 *Trust v. Logitech, Inc., et al.*, Case No. 08cv308, filed February 15, 2008 in the
19 United States District Court for the District of Southern California. Plaintiff alleges
20 infringement of the '184 patent by Defendants. Assignment to the same district
21 judge as other '184 patent cases in the district has already occurred.

22 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
23 *Trust v. Rally Manufacturing, Inc., et al.*, Case No. 08cv302, filed February 15, 2008
24 in the United States District Court for the District of Southern California. Plaintiff
25 alleges infringement of the '184 patent by Defendants. Assignment to the same
26 district judge as other '184 patent cases in the district has already occurred.

27 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
28 *Trust v. Sunbeam Products, Inc., et al.*, Case No. 08cv306, filed February 15, 2008 in

1 the United States District Court for the District of Southern California. Plaintiff
2 alleges infringement of the '184 patent by Defendants. Assignment to the same
3 district judge as other '184 patent cases in the district has already occurred.

4 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
5 *Trust v. CTT Tools, Inc., et al.*, Case No. 08cv231, filed February 5, 2008 in the
6 United States District Court for the District of Southern California. Plaintiff alleges
7 infringement of the '184 patent by Defendants. Assignment to the same district
8 judge as other '184 patent cases in the district has already occurred.

9 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
10 *Trust v. Global Machinery Company, et al.*, Case No. 08cv233, filed February 5,
11 2008 in the United States District Court for the District of Southern California.
12 Plaintiff alleges infringement of the '184 patent by Defendants. Assignment to the
13 same district judge as other '184 patent cases in the district has already occurred.

14 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
15 *Trust v. Emissive Energy Corp., et al.*, Case No. 08cv234, filed February 5, 2008 in
16 the United States District Court for the District of Southern California. Plaintiff
17 alleges infringement of the '184 patent by Defendants. Assignment to the same
18 district judge as other '184 patent cases in the district has already occurred.

19 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
20 *Trust v. Motorola, Inc., et al.*, Case No. 3:08-cv-0136 LAB RBB, filed January 23,
21 2008 in the United States District Court for the District of Southern California.
22 Plaintiff alleges infringement of the '184 patent by Defendants. Assignment to the
23 same district judge as other '184 patent cases in the district has already occurred.

24 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
25 *Trust v. Sanyo North America Corporation, et al.*, Case No. 3:08-cv-0135 DMS
26 POR, filed January 23, 2008 in the United States District Court for the District of
27 Southern California. Plaintiff alleges infringement of the '184 patent by Defendants.
28 Assignment to the same district judge as other '184 patent cases in the district has

1 already occurred.

2 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
3 *Trust v. Informatics, inc., et al.*, Case No. 3:08-cv-0134-L NLS, filed January 23,
4 2008 in the United States District Court for the District of Southern California.
5 Plaintiff alleges infringement of the '184 patent by Defendants. Assignment to the
6 same district judge as other '184 patent cases in the district has already occurred.

7 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
8 *Trust v. Ryobi Technologies, Inc., et al.*, Case No. 3:08-cv-0070-BTM-CAB, filed
9 January 11, 2008 in the United States District Court for the District of Southern
10 California. Plaintiff alleges infringement of the '184 patent by Defendants.
11 Assignment to the same district judge as other '184 patent cases in the district has
12 already occurred.

13 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
14 *Trust v. Senco Products, Inc.*, Case No. 3:08-cv-0071-BTM-CAB, filed January 11,
15 2008 in the United States District Court for the District of Southern California.
16 Plaintiff alleges infringement of the '184 patent by Defendants. Assignment to the
17 same district judge as other '184 patent cases in the district has already occurred.

18 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
19 *Trust v. Emerson Electric Co., et al.*, Case No. 3:08-cv-0060-BTM-CAB, filed
20 January 10, 2008 in the United States District Court for the District of Southern
21 California. Plaintiff alleges infringement of the '184 patent by Defendants.
22 Assignment to the same district judge as other '184 patent cases in the district has
23 already occurred.

24 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
25 *Trust v. Energizer Holdings, Inc., et al.*, Case No. 3:07-CV-2321-BTM-CAB, filed
26 December 11, 2007 in the United States District Court for the Southern District of
27 California. Plaintiff alleges infringement of the '184 patent by Defendants.
28 Assignment to the same district judge as other '184 patent cases in the district has

1 already occurred.

2 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
3 *Trust v. Giant International, Inc., et al*, Case No. 3:07-CV-2121-BTM-CAB, filed
4 November 6, 2007 in the United States District Court for the Southern District of
5 California. Plaintiff alleges infringement of the '184 patent by Defendants.
6 Assignment to the same district judge as other '184 patent cases in the district has
7 already occurred.

8 *Jens Erik Sorensen as Trustee of Sorensen Research and Development Trust v.*
9 *Esseplast (USA) NC, Inc., et al*, Case No. 3:07-cv-2277-BTM-CAB, filed December
10 4, 2007 in this District. Plaintiff alleges infringement of the '184 patent by
11 Defendants. Assignment to the same district judge as other '184 patent cases in the
12 district has already occurred.

13 *Jens Erik Sorensen as Trustee of Sorensen Research and Development Trust v.*
14 *Helen of Troy Texas Corporation, et al*, Case No. 3:07-cv-2278-BTM-CAB, filed
15 December 4, 2007 in this District. Plaintiff alleges infringement of the '184 patent
16 by Defendants. Assignment to the same district judge as other '184 patent cases in
17 the district has already occurred.

18 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
19 *Trust v. Digital Networks North America, Inc., et al*, Case No. 3:07-5568-JSW, filed
20 November 1, 2007 in the United States District Court for the Northern District of
21 California. Plaintiff alleges infringement of the '184 patent by Defendants. The
22 Northern District has already reviewed whether this case was related to other '184
23 patent cases in the Northern District and found it was not.

24 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
25 *Trust v. The Black & Decker Corporation, et al*, Civil Case No.: 3:06-CV-1572-
26 BTM-CAB, filed August 7, 2006, in the United States District Court for the Southern
27 District of California. Plaintiff alleges infringement of the '184 patent by
28 Defendants. Assignment to the same district judge as other '184 patent cases in the

1 district has already occurred.

2
3 **SETTLED AND DISMISSED**

4 *Jens Erik Sorensen as Trustee of the Sorensen Research And Development*
5 *Trust v. Tecnica USA, Inc and Nordica USA, Inc.*, Civil Case No. 06CV1941 B
6 MLS, filed September 18, 2006 in the Southern District of California. The action
7 was settled by the parties, and dismissed.

8 *Jens Erik Sorensen As Trustee of The Sorensen Research And Development*
9 *Trust v. Head USA Inc.* Civil Case No.: 06CV1434BTN CAB, filed July 2006 in
10 the Federal District for the Southern District of California. The action was settled by
11 the parties, and dismissed.

12 *Head USA Inc. v. Jens Erik Sorensen (As Trustee of The Sorensen Research*
13 *And Development Trust), and Sorensen Research And Development Trust.* Docket
14 No.: 306CV00983, filed June 2006 in the Federal District of Connecticut. The matter
15 was transferred and consolidated with the *Sorensen Research And Development*
16 *Trust v. Head USA Inc.* action filed in the Southern District of California, Civil Case
17 No.: 06CV1434BTM CAB. The action was later settled by the parties, and
18 dismissed.

19 *Nordica USA Corp. v. Jens Ole Sorensen, Jens Erik Sorensen, and Sorensen*
20 *Research and Development Trust.* Docket No. 1:06-cv-91-JM filed March 8, 2006 in
21 the Federal District of New Hampshire. The matter was transferred and consolidated
22 with *Jens Erik Sorensen As Trustee of The Sorensen Research And Development*
23 *Trust v. Tecnica USA, Inc and Nordica USA, Inc.*, Civil Case No. 06CV1941 B
24 MLS, filed in the Southern District of California. The action was later settled by the
25 parties.

26 *Jens Ole Sorensen, and Jens E. Sorensen, as Trustee Of The Sorensen*
27 *Research and Development Trust v. DaimlerChrysler AG, and Mercedes-Benz USA,*
28 *LLC.* Civil No. 03-1763 (HAA) filed in the United States District Court for

1 Northern California and transferred to the United States District Court for New
2 Jersey. This matter has been settled and dismissed.

3 *In the Matter of Certain Automobile Tail Light Lenses And Products*
4 *Incorporating Same.* Investigation No. 337-TA-502 filed in the United States
5 International Trade Commission. The matter was remanded after appeal to the
6 Federal Circuit Court of Appeals, then settled and dismissed.

7 *Jens E. Sorensen, as Trustee Of The Sorensen Research and Development*
8 *Trust v. Premier Automotive Group, Ford Motor Company, and Jaguar, Ltd.* Case
9 No. 03-cv-01107, filed March 14, 2003 in the Federal Court for the Northern District
10 of California. The matter was settled and dismissed.

11 *Sorensen et al v. International Trade Commission et al.*, 427 F.3d 1375 (Fed.
12 Cir. 2005). After the Federal Circuit ruled in patentee's favor, the parties settled and
13 dismissed.

14
15 **DISMISSED**

16 *DMS Holdings, Inc. v. Sorensen Research & Development Trust.* Civil Case
17 No.: 07-CV-02690, filed May 11, 2007, in the United States District Court for the
18 Northern District of Illinois. This case has been dismissed. Sorensen filed against
19 DMS Holdings in the United States District Court for Southern California (see
20 above).

21 *Lowe's Companies, Inc., et al v. Sorensen Research and Development Trust.*
22 Case No. 05-cv-00234 filed July 29, 2005 in the Federal Court for the Western
23 District of North Carolina. The matter was never served and was dismissed.

24 *Digital Innovations LLC v. Sorensen Research and Development Trust.* Case
25 No. 05-cv-06428, filed November 9, 2005 in the Federal Court for the Northern
26 District of Illinois. The matter was never served and was dismissed.

27 *Big Lots v. Sorensen Research and Development Trust.* Case No. 2:06-cv-
28 1089, filed December 29, 2006 in the Federal Court for the Southern District of

1 Ohio. The matter was never served and was dismissed.

2 *Bon-Aire v. Sorensen Research and Development Trust*. Case No. 07-cv-054-
3 S, filed January 2007 in the Federal Court for the District of Idaho. The matter was
4 never served and was dismissed.

5 *Husqvarna Outdoor Products, Inc. v. Sorensen Research and Development*
6 *Trust*. CIV. NO. CV106-160 in the Federal Court for the Southern District of
7 Georgia on October 30, 2006. The matter was never served and was dismissed.

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9
10 DATED this Tuesday, September 16, 2008.

11 JENS ERIK SORENSEN, as Trustee of
12 SORENSEN RESEARCH AND DEVELOPMENT
13 TRUST, Plaintiff

14 /s/ Melody A. Kramer

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Melody A. Kramer, Esq.

16 J. Michael Kaler
17 Attorney for Plaintiff
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